

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGE-
MENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

Pursuant to Local Rule 83D(b), and Local Bankruptcy Rule 9010-1, Lucas C. Townsend respectfully moves the Court for leave to withdraw as counsel for Aurelius Investment, LLC, Aurelius Opportunities Fund, LLC, and Lex Claims, LLC (“Aurelius”) in the above captioned matter, and in support of this Motion certifies as follows:

1. On August 7, 2017, I entered an appearance on behalf of Aurelius in the above captioned matter for purposes of prosecuting a constitutional challenge to the appointments of the members of the Financial Oversight and Management Board for Puerto Rico. Dkt. 911.

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III Case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“PRHTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III Case numbers are listed as bankruptcy case numbers due to software limitations).

2. Final Judgment was entered as to that matter on July 15, 2020. Dkt. 13669.
3. Aurelius is aware of and consents to my withdrawal as counsel, and has been provided with a copy of this Motion.
4. Aurelius will continue to be represented in the underlying proceedings by its current counsel of record and the attorneys who have entered appearances on Aurelius's behalf. *See* Dkt. 68.
5. In accordance with Local Bankruptcy Rule 9010-1(d)(3)(D), I certify that upon receiving leave to withdraw I will immediately serve on Aurelius this Court's order permitting withdrawal.

Date: April 15, 2021

Respectfully submitted,

/s/ Luis A. Oliver-Fraticelli

/s/ Lucas C. Townsend

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CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2021, I caused this Motion for Leave to Withdraw as Counsel to be filed through local counsel with the Clerk of the Court using the CM/ECF system, thereby effecting service on all parties registered to receive CM/ECF notifications in this matter, and that I have further caused this Motion to be served via U.S. Mail on the United States Trustee.

Date: April 15, 2021

Respectfully submitted,

/s/ Luis A. Oliver-Fraticelli

/s/ Lucas C. Townsend